

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

FCS ADVISORS, LLC,

Plaintiff,

*-against-*

THEIA GROUP, INC., d/b/a “THORIAN  
GROUP” and/or “CYPHERIAN”;

THEIA AVIATION, LLC; and

THEIA HOLDINGS A, INC., d/b/a “THORIAN  
HOLDINGS,”

Defendants.

21 Civ. 6995

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and upon the accompanying Declaration of Fernando Menendez, including all of the exhibits appended thereto, Aithre Capital Partners, LLC (“ACP”) will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order permitting ACP to intervene in the above action for the limited purpose of addressing the request for a temporary receiver, pursuant to Federal Rule of Civil Procedure 24(b).

Dated: September 9, 2021  
New York, New York

Respectfully submitted,

**SEQUOR LAW, P.A.**  
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By: /s/ Fernando Menendez  
Fernando Menendez

*Counsel for Aithre Capital Partners,  
LLC (ACP)*